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8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**

10 ALEXANDRA RASEY-SMITH, et al.,
11
12 Plaintiffs,

13 vs.

14 CITY OF LOS ANGELES, et al.,
15 Defendants.

Case No. 2:24-cv-03265-MWC-SSC

**DECLARATION OF ERIC
VALENZUELA IN SUPPORT OF
PLAINTIFFS' MOTION TO AMEND
THE COMPLAINT/MODIFY THE
SCHEDULING ORDER**

DECLARATION OF ERIC VALENZUELA

I, Eric Valenzuela, declare and state as follows:

1. I am an attorney duly licensed to practice law before this Court and I am one of the attorneys of record for the Plaintiffs in the instant action.

2. I am personally familiar with the facts contained herein and would and could competently testify thereto if called upon to do so.

3. I am filing this Declaration in support of Plaintiffs motion to Amend the Complaint/Modify the Scheduling Order.

4. Defendants' Responses to Plaintiffs' Request for Production of Documents did not contain any of the investigation materials regarding the shooting, including the Force Investigation Division Report, and the recorded interviews of the involved officers.

5. Attached hereto as **Exhibit "A"** is a true and correct copy of the January 13, 2025, Email from Defense Counsel to Plaintiffs' Counsel.

6. Defendants' discovery responses contained almost 1,500 documents, none of which clearly identified the name of the shooting officer.

7. After recently reviewing these documents again, I discovered one line in one of the reports which indicated that Officer Caleb Garcia Alamilla was monitored after his OIS (officer involved shooting).

8. Many of the other reports also make mention of all involved officers being monitored after the OIS.

9. Attached hereto as **Exhibit "B"** is a true and correct copy of the Watch Commander's Daily Report.

10. Attached hereto as **Exhibit "C"** is a true and correct copy of the January 2, 2025, Email that I sent to Defense Counsel.

11. Attached hereto as **Exhibit "D"** is a true and correct copy of the Email that I sent to Defense Counsel.

1 12. Attached hereto as **Exhibit “E”** is a true and correct copy of the
2 January 13, 2025, Email from Defense Counsel to Plaintiffs’ Counsel.

3 13. Our office routinely stipulates with the City Attorney’s Office to amend
4 the complaint to add the shooting officer in these types of cases.

5 14. Attached hereto as **Exhibit “F”** is a true and correct copy of the
6 December 20, 2024, Email from Defense Counsel to Plaintiffs’ Counsel.

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8 I declare under penalty of perjury under the law of the Unites States of
9 America that the forgoing is true and correct.

10
11 DATED: January 14, 2025

/s/ Eric Valenzuela

Eric Valenzuela